

Counsel listed on the following page.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT
SAN FRANCISCO DIVISION

PETER WRIGHT and MICHELLE
TRAME, individually, on behalf of all
others similarly situated, and on behalf of
the general public,

Plaintiffs,

vs.

ADVENTURES ROLLING CROSS
COUNTRY, INC., dba ADVENTURES
CROSS COUNTRY (ARCC), a California
Corporation, SCOTT VON ESCHEN, and
DOES 1 through 50 inclusive,

Defendants.

Case No. 3:12-cv-00982-EMC

**JOINT STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE;
[PROPOSED ORDER]** Modified

Judge: Edward M. Chen
Ctrm: 5, 17th Floor

Case Management Conference:
November 9, 2012, 9:00 a.m.

AND RELATED COUNTER ACTION

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11 *dba ADVENTURES CROSS COUNTRY (ARCC) and*
Defendant SCOTT VON ESCHEN

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1 TO THE COURT:

2 Plaintiffs PETER WRIGHT and MICHELLE TRAME (“Plaintiffs”) and Defendants
3 ADVENTURES ROLLING CROSS COUNTRY, INC., SCOTT VON ESCHEN and Cross-
4 Claimant SCOTT VON ESCHEN (“Defendants”), by and through their respective counsel of
5 record, herein agree and stipulate as follows:

6 **RECITALS**

7 1. The current counsel of record for Defendants filed a Notice of Appearance on
8 October 4, 2012, having recently substituted into this matter to represent Defendants.

9 2. The parties now respectfully request that the Case Management Conference
10 currently set for November 9, 2012 be vacated and re-scheduled in accordance with the court’s
11 calendar one week later, to November 16, 2012. There is good cause for this brief continuance
12 because Defendants’ counsel of record, Reed E. Schaper, who recently substituted in as counsel,
13 has a previously-scheduled appearance in Southern California on November 9, 2012.

14 **STIPULATION**

15 NOW, THEREFORE, Plaintiffs and Defendants hereby agree and stipulate as follows,
16 subject to Court approval, that the Case Management Conference set for November 9, 2012 be
17 vacated and continued to November 16, 2012 at 9:00 a.m., with a Joint Case Management
18 Statement filed one week prior to the re-scheduled conference.

19 IT IS SO STIPULATED:
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1 Dated: October 17, 2012

HIRSCHFELD KRAEMER LLP

3 By: /s/ Kristin L. Oliveira

Reed E. Schaper

Kristin L. Oliveira

Attorneys for Defendants

ADVENTURES ROLLING CROSS

COUNTRY, INC., dba ADVENTURES

CROSS COUNTRY (ARCC) and SCOTT

VON ESCHEN

8 Dated: October 16, 2012

BRYAN SCHWARTZ LAW

RUDY EXELROD ZIEFF & LOWE, LLP

10 By: /s/ Bryan J. Schwartz

Bryan J. Schwartz

Attorneys for Plaintiffs

PETER WRIGHT and MICHELLE TRAME

HIRSCHFELD KRAEMER LLP
ATTORNEYS AT LAW
SANTA MONICA

15 ~~[PROPOSED]~~ ORDER

16 Pursuant to the parties' Joint Stipulation, it is so ordered that the Case Management
17 Conference is re-scheduled from November 9, 2012 to November ¹⁵~~16~~, 2012 at 9:00 a.m. A Joint
18 Case Management Conference statement shall be filed by November ⁸~~9~~, 2012.

21 Dated: October ²²~~17~~, 2012

